

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LYNNE FREEMAN,

Plaintiff,

-against-

TRACY DEEBE-ELKENANEY, et al.

Defendants.

Case No. 22-cv-02435 (LLS)(SN)

**DECLARATION OF STEPHEN M.
DONIGER, ESQ. IN SUPPORT OF
PLAINTIFF'S MOTION FOR
RECONSIDERATION OF THE
COURT'S JUNE 14, 2023 ORDER**

DECLARATION OF STEPHEN M. DONIGER, ESQ.

I, Stephen M. Doniger, do hereby declare as follows:

1. I am above eighteen (18) years of age and am competent to give the testimony set forth below. Said testimony is given in support of Plaintiff's Motion for Reconsideration of the Court's June 14, 2023 Order. If called as a witness, I could and would competently testify as set forth below:

2. I have been admitted Pro Hac Vice to practice before this Court. I am a shareholder of the law firm Doniger / Burroughs, and am counsel for Plaintiff, Lynne Freeman ("Freeman"), in this action.

3. Freeman has retained Kathryn Reiss ("Reiss"), a professor of English and Creative Writing at Mills College at Northeastern University, to testify as an expert witness on certain matters involved in this action. On May 10, 2023 Freeman produced to Defendants an expert report Professor Reiss, a true and correct copy of which is attached hereto as **Exhibit 1**.

4. Freeman also retained Dr. Patrick Juola (“Dr. Juola”) as an expert witness in this action and produced his expert report to Defendants, a true and correct copy of which is attached hereto as **Exhibit 2**.

5. Freeman also retained Dr. Carole E. Chaski (“Dr. Chaski”) as an expert witness in this action and produced her expert report to Defendants, a true and correct copy of which is lodged under seal concurrent with this motion because it includes references to documents that Defendants have marked as confidential. A redacted copy of that report which removes only those references to confidential documents is attached hereto as **Exhibit 3**.

I declare under penalty of perjury and the laws of the United States of America that the foregoing is true and correct,

Executed June 20, 2023 at Venice, CA



Stephen M. Doniger, Esq.
Declarant